
Module 2: Removal Actions and Expedited Remedial Actions



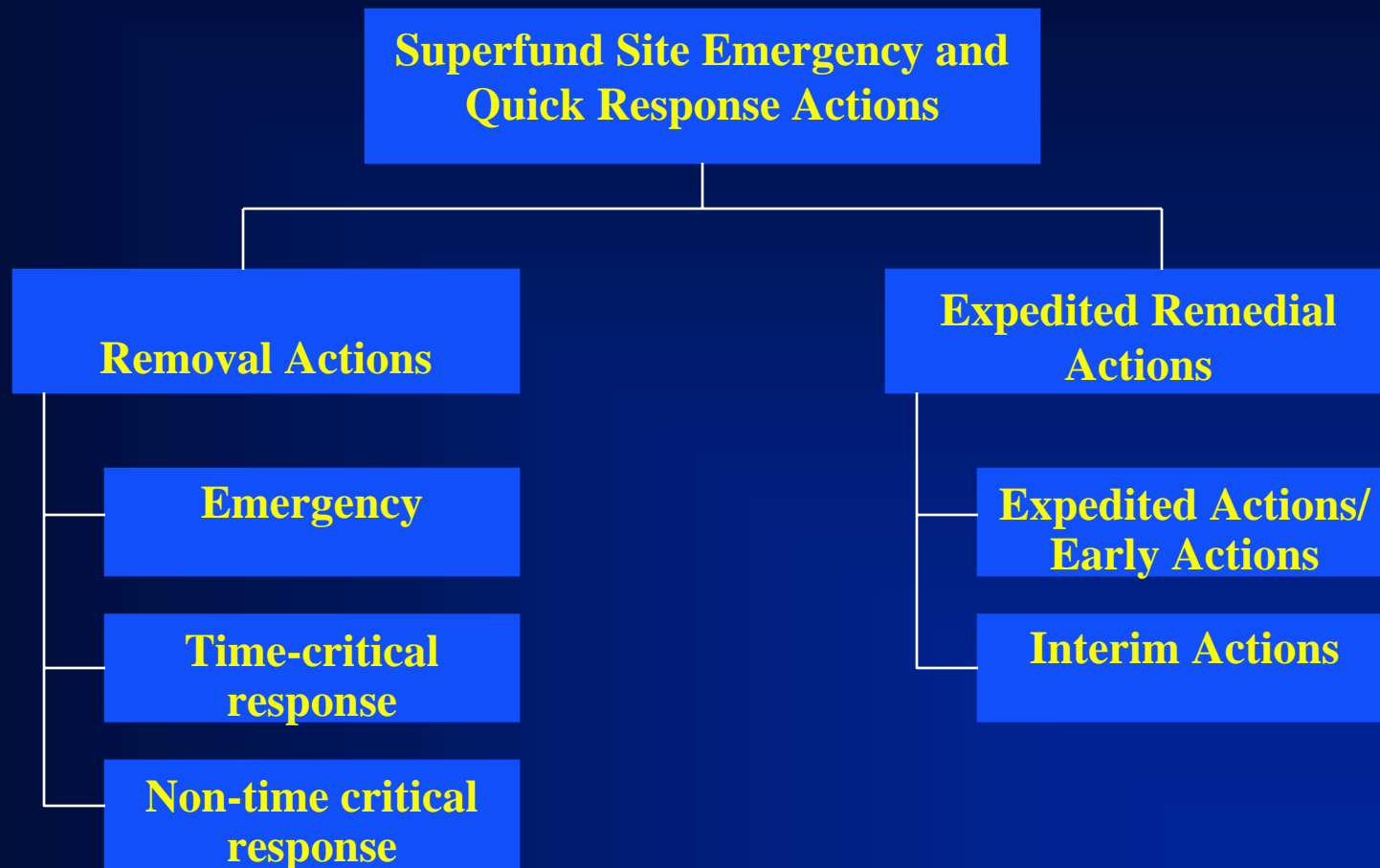
Module Objectives

- ❑ **Identify the three kinds of removal actions**
- ❑ **Explain the relationship between the removal program and DOE's decommissioning policy under CERCLA**
- ❑ **Identify the two types of expedited remedial actions**
- ❑ **Identify how removal actions and expedited remedial actions must conform with the overall long-term remedial process**
- ❑ **Indicate where, in the CERCLA long-term remedial program, removal actions and expedited remedial actions can occur**

Removal Actions and Expedited Remedial Actions

- ❑ Tools which can be used to respond to emergency or quick response situations
- ❑ Actions may be interim or “final”
- ❑ The remainder of the slides in this module will describe removal actions and expedited remedial actions in detail

Removal Actions and Expedited Remedial Actions



What are Removal Actions?

- ❑ Short-Term Actions designed to respond to immediate threats**
- ❑ Taken under CERCLA §104 Authority**
- ❑ Do not require NPL listing**
- ❑ Can be followed by or be a part of remedial response**
- ❑ Statutory limits of 12 months and \$2 million**

Removal Actions and Expedited Remedial Actions

Types of Removal Actions

Removal Action	Key features of action
Emergency	<ul style="list-style-type: none">• Require immediate response• Approval usually obtained after the fact
Time- critical response	<ul style="list-style-type: none">• Require response within six months• Require public notice and comment
Non-time critical response	<ul style="list-style-type: none">• Generally six month planning period• Approval required before initiation• Require EE/CA analysis of alternatives• Require public notice and comment on EE/CA

ARARS and the Removal Process

- ❑ **Removal actions must comply with ARARs to extent practicable**
- ❑ **Extent practicable defined by:**
 - **Exigencies of situation**
 - **Scope of removal action**
 - **Statutory limits**
- ❑ **Permits**
- ❑ **Off-site rule**

Decommissioning Policy under CERCLA

- ❑ **DOE is authorized to evaluate, select, and implement CERCLA removal actions if they determine such actions are necessary**
- ❑ **Selection and implementation of an action must comply with the requirements of CERCLA, the NCP, and other applicable authorities**
- ❑ **Decommissioning activities are discussed in detail in a future section of this course**

What are Expedited Remedial Actions?

- ❑ Short-term actions taken as a result of a emergency or quick response situations**
- ❑ May be taken under remedial action authority or authority of Federal Facility Agreement**
- ❑ Require NPL listing**
- ❑ May be interim or final actions**

Types of Remedial Response Actions

Expedited Remedial Action

Key features of action

Expedited Action or Early Action

- Action taken as a result of new findings during a field investigation
- Taken under remedial action authority or authority of Federal Facility Agreement

Interim Action

- Temporary action taken until a final remedy can be decided and implemented
- Taken under remedial action authority
- May be followed immediately or later by a final action

RCRA Stabilization Initiatives

- ❑ **Actions taken as soon as practicable to address actual or potential exposures to hazardous wastes and to control any further spread of contamination**
- ❑ **EPA defines a "bias" for stabilization**
- ❑ **Focus is to take action at high priority sites rather than fully investigate releases at fewer facilities**

Key Concepts of Expedited Remedial Actions

Features	Key Points
Planning	<ul style="list-style-type: none">• Identify when action can occur• How will action be conducted as part of overall site strategy?• Do actions meet criteria of site-specific agreements or strategy documents• Evaluate use of existing emergency procedures
Types of Actions Available	<ul style="list-style-type: none">• Vary by circumstances and needs of each site• Major features include:<ul style="list-style-type: none">- Use of common approaches to remediation problems (e.g., well-established technologies)- Have easily fulfilled data needs- can be modified or adjusted to site-specific circumstances (e.g., slurry or barrier walls)

Key Concepts of Expedited Remedial Actions (con't)

Features	Key Points
Data Needs	<ul style="list-style-type: none">• Vary by technology• Emphasis on less collection and more monitoring• Need to be sufficient to justify action taken and technology selected• Qualitative risk assessments often are a basis to justify action• Existing data or limited field investigation data can be used to select technologies
Consistency with final remedial actions	<ul style="list-style-type: none">• Will the action result have a similar level of risk exposure?• What will be the effects to cost of final remedy?• Will the action make preferred remedies infeasible or impractical?• Will actions of short-term impacts be greater?

Key Concepts of Expedited Remedial Actions (con't)

Features	Key Points
Documentation	<ul style="list-style-type: none">• Requirements defined by site-specific comppliance agreements• Generally include:<ul style="list-style-type: none">- rationale for expedited action- consistency with overall strategy- Action-specific plans; work plan; Health and Safety Plan; Waste Management plan, and QAPP

Module Summary

- ❑ Removal Actions and Expedited Remedial Actions are tools which can be used in quick response or emergency situations**
- ❑ The three types of removal actions include:**
 - Emergency responses**
 - Time-critical responses**
 - Non-time critical responses**
- ❑ The Decommissioning policy under CERCLA authorizes DOE to evaluate, select and implement removal actions that the DOE determines are necessary**

Module Summary (con't)

- ❑ **The two types of remedial actions are**
 - **Expedited action or early actions**
 - **Interim actions**
- ❑ **The removal and expedited remedial actions may be interim or final, but they must, to the extent practicable, contribute to the efficient performance of any long term remedial action for the release.**

Exercise 2

Removal Actions, Interim Actions, and Expedited Actions: A Case Study

□ Exercise Objective:

- Provide practice on how to apply removal and interim actions at a hypothetical site**